

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO: WAVE 8 CASES ON ATTACHED EXHIBIT A</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS  
AND TESTIMONY OF DOROTHY KAMMERER-DOAK, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Dorothy Kammerer-Doak, M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and IFUs, including opinions regarding what risks of the devices other doctors know of; (2) whether the product at issue is associated with chronic or long-term pain; and (3) any opinion regarding safety, efficacy, or personal satisfaction rates of the mesh products observed in her own practice. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: October 18, 2018

Respectfully submitted,

/s/ Thomas P. Cartmell

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on October 18, 2018, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell

**Attorney for Plaintiffs**

## **INDEX OF EXHIBITS**

**Exhibit A:** List of cases on which Dr. Kammerer-Doak is designated

**Exhibit B:** TVT Expert Report, Reliance and CV

**Exhibit C:** Kammerer-Doak Deposition